

December 2, 2016

Via Electronic Filing

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Room TW-A325 Washington, DC 20554

Re: In the Matter of Lifeline and Link Up Reform and Modernization Notice of Forbearance from Lifeline BIAS Requirements WC Docket No. 11-42

Pursuant to the *Lifeline Modernization Order*¹ and the *BIAS Forbearance Public Notice*,² as authorized representatives of Cellular Network Partnership d/b/a Pioneer Cellular ("CNP"), we hereby submit this Notice of Forbearance from Lifeline broadband internet access service ("BIAS") requirements throughout CNP's Eligible Telecommunications Carrier ("ETC") service areas.

CNP is a competitive ETC with service areas in portions of Kansas and Oklahoma. As a recipient of frozen high cost support ("FHCS"), CNP is not required to provide Lifeline-supported BIAS in its ETC service area.³ CNP is availing itself of the FCC's forbearance from the Lifeline BIAS requirement throughout its ETC service areas as listed in Attachment A.

Pursuant to advice from Wireline Competition Bureau staff, CNP will supplement this filing with census block information at a future date.

¹ Lifeline and Link Up Reform and Modernization et al., Third Report and Order, Further Report and Order,, and Order on Reconsideration, 31 FCC Rcd 3962 (2016)("Lifeline Modernization Order").

² Wireline Competition Bureau Provides Guidance Regarding Filing Procedures for Eligible Telecommunications Carriers Seeking to Invoke Forbearance Granted by Lifeline Modernization Order, Public Notice, WC Docket No. 11-42, DA 16-1316 (WCB. rel. November 22, 2016) ("BIAS Forbearance Public Notice").

³ Unlike recipients of other types of high-cost support, who were granted forbearance based on census block, FHCS recipients "are not required to offer Lifeline-supported broadband services in their designated service areas." *See* Lifeline Modernization Order, 31 FCC Rcd at 4074 (Para. 311).

Notwithstanding this forbearance filing and in accordance with the *Lifeline Modernization Order*, CNP reserves the right to offer and receive reimbursement for providing Lifeline-supported BIAS to eligible subscribers.⁴

Please contact the undersigned if you have questions.

Sincerely,

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⁴ See id. See also, BIAS Forbearance Public Notice, supra, at p. 2

WC Docket No. 11-42 Cellular Network Partnership d/b/a Pioneer Cellular Lifeline BIAS Forbearance Filing

Attachment A Information Regarding ETC Designations

ETC Name	SAC	State	Designating Authority	Date(s) of
				Designation
Cellular Network Partnership	419014	KS	Kansas Corporation	11/21/2006
			Commission	
Cellular Network Partnership	439031	OK	Oklahoma Corporation	3/1/2005,
			Commission	8/23/2012